

**UNITED STATES DISTRICT COURT FOR THE
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

KATHLEEN WILLIAMS,)	
)	
)	
Plaintiff,)	No. 07 C 6997
)	
v.)	
)	
BOARD OF EDUCATION OF THE CITY OF CHICAGO and CHRISTINE MUNNS, individually and as an agent of defendant Board)	Judge George Lindberg
)	Magistrate Judge Schenkier
)	
Defendants.)	

JOINT MOTION TO EXTEND DISCOVERY

Plaintiff, Kathleen Williams (“Plaintiff”), and Defendants, Board of Education of the City of Chicago (“CPS”) and Christine Munns (“Munns”), by and through their respective attorneys, Elaine K.B. Siegel & Associates, P.C., and the Board of Education of the City of Chicago- Law Department, moves to extend discovery to October 6, 2008, and in support states:

1. In this case, Plaintiff alleges, *inter alia*, that CPS terminated her employment as a second grade teacher at Sauganash Elementary School because of her pregnancy, and in retaliation for filing a complaint alleging pregnancy discrimination with her local union.
2. Defendants have denied these allegations.
3. Discovery is currently scheduled to end on August 6, 2008.
4. The parties have been diligently pursuing discovery. However, CPS counsel informs us that numerous witnesses in this matter are either parents or teachers at Sauganash Elementary School, a CPS facility, and have been unavailable for depositions due to summer vacation. For example, Ms. Gladis Kojo, a witness relied upon by Defendants, has been on

vacation in Arizona and Florida throughout the summer. Another witness, Pearl Kwan, has been in Hong Kong. Neither witness will be returning to Illinois until August 2008.

5. The Sauganash Elementary School academic year does not begin until September 2, 2008. In the interim, CPS is unable to make many witnesses available for deposition.

6. The Plaintiff's initial depositions of defense witnesses have revealed numerous additional witnesses, whose relevance to this case was not previously known to Plaintiff. Plaintiff anticipates that she must depose approximately a dozen additional witnesses, some of whom are currently unavailable.

7. Defendants advises that they also anticipate deposing additional witnesses.

8. It is necessary for Plaintiff to conduct discovery into student and faculty information that CPS deems confidential. CPS has denied discovery of any information regarding student records, comparable employees' evaluations, personnel records, and disciplinary records without a protective order. As of this date, July 31, 2008, this Court has just entered the parties' agreed protective order.

9. CPS counsel has stated that its teachers will be unavailable for depositions the first two weeks of school, when they have additional planning and administrative tasks. CPS counsel represents that during this time period, it is particularly important that students become familiar with their teachers and establish a daily routine.

10. In addition, Plaintiff's counsel has a one- to two- week jury trial that begins September 17, 2008, in the Circuit Court of Cook County, on *Antonio Vernon v. University of Chicago*, 02L 015749.

WHEREFORE, for the reasons set forth above and in the supporting affidavit of Elaine

K.B. Siegel, Plaintiff respectfully prays that this Court grant the joint motion to extend discovery until October 6, 2008.

Dated: July 31, 2008

Respectfully Submitted,

Elaine K.B. Siegel

/s/Elaine K.B. Siegel
One of the Attorneys for the Plaintiff
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